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## Via E-mail and Regular Mail

June 4, 2014

The Honorable Martin Glenn United States Bankruptcy Court Southern District of New York One Bowling Green New York, NY 10004-1408

Re: In re: Sino-Forest Corporation

Chapter 15

Case No. 13-10361 (MG)

Dear Judge Glenn:

The undersigned serves as U.S. bankruptcy counsel to the lead plaintiffs (the "Lead Plaintiffs") in both the pending Canadian and U.S. class action securities litigation (the "Securities Class Actions") involving Sino-Forest Corporation and a number of non-debtors who remain defendants in the Securities Class Actions. The Court will no doubt recall that the last activity in the above-referenced chapter 15 proceeding was the entry of the Order recognizing and enforcing the Order of the Ontario Superior Court of Justice entered in the CCAA proceeding for Sino-Forest Corporation (the "Sino-Forest CCAA Proceeding") approving the settlement between the Lead Plaintiffs and Ernst & Young in the Securities Class Actions.

As the Court may recall, the Plan of Compromise and Reorganization (the "Plan") approved in the Sino-Forest CCAA Proceeding contemplated a process through which non-debtor defendants in the Securities Class Actions, in addition to Ernst & Young, could obtain certain protections through the Plan if a settlement was reached subsequent to the Plan's approval. A further settlement has now been negotiated between the Lead Plaintiffs, the Trustee of the SFC Litigation Trust and one of the individual defendants in the Securities Class Action, David Horsley. In that regard, we are requesting a conference with the Court, either in person or telephonically, to discuss an anticipated procedure for the approval of this most recent settlement in Canada before Justice Morawetz and the recognition and enforcement of such an order through this chapter 15 proceeding. Although similar in some respects to the approval of the Ernst & Young settlement previously recognized by this Court, there are certain fundamental differences that the parties believe require the consideration of a more streamlined process if acceptable to Your Honor and Justice Morawetz. The requested conference would allow the parties to outline for the Court the procedure being considered so that we have some guidance

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prior to seeking the necessary relief in both Canada before Justice Morawetz and before this Court.

We appreciate the Court's consideration and are available at the Court's convenience.

Respectfully submitted

Michael S. Etkin MSE/cbs

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CC: Via E-mail

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